

**Before the
Federal Communications Commission
Washington, DC**

Reply Comments)	
in the Matter of)	
Application by Verizon for)	CC Docket 01-138
Authorization Under Section 271 to)	
Provide Long Distance Service in)	
Pennsylvania)	

The National Consumers League is a private, nonprofit consumer advocacy organization founded in 1899 to identify, protect, represent, and advance the economic and social interests of consumers and workers. NCL believes that increased competition in telecommunications services can result in more choices for products and services at reduced prices. While NCL has generally been supportive of Verizon's entry into the long distance marketplace, it also believes that all elements of the 14-point checklist must be met before approval is granted.

NCL is concerned by comments from the Pennsylvania Office of Consumer Advocate, the dissenting statements by Commissioners Terrance J. Fitzpatrick and Nora Mead Brownell to the Pennsylvania Public Utility Commission's Consultative Report on the Verizon application, and issues raised by the U.S. Department of Justice in its evaluation of the application. These indicate that Verizon has not yet completely met its obligations under the checklist. Moreover, some of the issues that have been raised, such as unresolved billing problems and equal access to loop qualification information, are central to whether fair competition can really be achieved.

Verizon should be commended for its commitment to educating consumers about how to understand their phone bills and avoid abuses such as slamming and cramming, and the leadership it has demonstrated in working with others in the telecommunications industry to curb the problem of cramming. Verizon is also one of the few telecommunications companies that seeks input through a board of consumer representatives. This self-governing body plays a strong role in advising the company on a wide range of consumer issues. As a unionized company, Verizon provides employees with good wages, working conditions, and other benefits.

NCL hopes that Verizon can resolve outstanding concerns about meeting its checklist requirements to the satisfaction of the Federal Communications Commission so Pennsylvania consumers and workers can reap the benefits of competition in that state.

Respectfully submitted,

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